## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

	)
In re:	) Chapter 11
	)
JOANN INC., et al., <sup>1</sup>	) Case No. 25-10068 (CTG)
	)
Debtors.	) (Jointly Administered)
	)
	) Re: Docket Nos. 1040 & 1266

# CERTIFICATION OF COUNSEL REGARDING SUPPLEMENTAL TWENTY-FOURTH NOTICE OF REJECTION OF CERTAIN EXECUTORY CONTRACTS AND/OR UNEXPIRED LEASES

The undersigned counsel to JOANN Inc. and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the "<u>Debtors</u>"), hereby certifies as follows:

- 1. On May 30, 2025, the Debtors filed the *Twenty-Fourth Notice of Rejection of Certain Executory Contracts and/or Unexpired Leases* [Docket No. 1040] (the "Rejection Notice") regarding the rejection of certain unexpired leases set forth in the Rejection Notice (the "Original Rejection List"). Attached to the Rejection Notice was a proposed form of rejection order (the "Rejection Order") authorizing the rejection of the unexpired leases on the Original Rejection List.
- 2. The deadline to object to the Rejection Notice was June 13, 2025 (the "Objection Deadline").

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

- 3. The Rejection Notice inadvertently omitted certain information related to the lease set forth in row no. 74 of the Original Rejection List. The Debtors did not receive any formal objection or informal comment to the Rejection Notice from the affected landlord, Cedar Crest Square Associates, LP ("Cedar Crest").
- 4. In an abundance of caution, on June 23, 2025, the Debtors filed the *Supplemental Twenty-Fourth Notice of Rejection of Certain Executory Contracts and/or Unexpired Leases* [Docket No. 1266] (the "Supplemental Rejection Notice"), including the inadvertently omitted information with respect to Cedar Crest. Pursuant to the Supplemental Rejection Notice, the deadline to object to the Supplemental Rejection Notice was June 30, 2025 (the "Supplemental Objection Deadline").
- 5. The Debtors did not receive any formal objection or informal comment to the Supplemental Rejection Notice from Cedar Crest.
- 6. Attached as **Exhibit A** is the proposed form of rejection order that was attached to the Supplemental Rejection Notice (the "Supplemental Rejection Order").
- 7. Accordingly, the Debtors request entry of the Supplemental Rejection Order attached hereto as **Exhibit A** at the Court's earliest convenience.

Dated: July 1, 2025 Wilmington, Delaware

#### /s/ Jack M. Dougherty

#### **COLE SCHOTZ P.C.**

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